IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

IN RE THE BANKRUPTCY ESTATE OF

No. 22-10701 Chapter 7

JACOB BLETNITSKY, *Debtors*.

Hon. Jacqueline P. Cox

AMENDED NOTICE OF MOTION

PLEASE TAKE NOTICE that on Tuesday, August 1, 2023 at 1:00 P.M. or as soon thereafter as counsel may be heard, the undersigned attorneys shall appear before the Honorable Jacqueline P. Cox, United States Bankruptcy Judge for the Northern District of Illinois, or any other Judge sitting in her place and stead, either in Courtroom 680 of the Dirksen Building located at 219 S. Dearborn in Chicago, Illinois or electronically as described below, and shall present the attached Creditors' Motion To Authorize Rule 2004 Examinations Duces Tecum and Rule 2004 Oral Examinations of Irina Bletnitsky, Felix Friedman, Irina Knaster, Russland Capital Group – South Loop, LLC and Alex Knaster, a copy of which is hereby served upon you.

All parties in interest, including the movant, may appear for the presentment of the motion either in person or electronically using Zoom for Government.

You may appear in person, electronically by video or by telephone.

To appear by video, use this link: https://www.zoomgov.com/. Then enter the meeting ID and password.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

Meeting ID and password. The meeting ID for this hearing is 161 273 2896 and the password is 778135. The meeting ID and further information can also be found on the Judge's web page on the Court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

Dated: July 14, 2023

Respectfully submitted,

CREDITOR, DR. STEPHEN LIPPITZ

/s/ Richard A. Saldinger
One of Creditor Dr. Lippitz's Attorneys

CREDITOR, SERGE BURASHKO

<u>/s/ Edward M. Rothschild</u>

One of Creditor Serge Burashko's Attorneys

Richard A. Saldinger (ARDC No. 6209930) Landsman Saldinger Carroll, PLLC Attorney for Creditor, Dr. Stephen Lippitz 161 N. Clark, Suite 1600 Chicago, IL 60601 Tel. (312) 291-4650 saldinger@lsclegal.com

Edward M. Rothschild (ARDC No. 2403196) Attorney for Creditor Serge Burashko 16 Monterey Drive Vernon Hills, Il 60060 Telephone 847 220-5600 edwardrothschild66@gmail.com

CERTIFICATE OF SERVICE

I, Richard A. Saldinger, an attorney, hereby certify that on July 14, 2023, pursuant to Section II.B.4 of the Administrative Procedures for the Case Management/Electronic Case Filing System and Fed.R.Civ.P. 5(a), I caused a copy of the foregoing *Amended Notice of Motion* and Certificate of Service to be served on the parties listed below by electronic notice where indicated by the presence of an electronic address and by United States Mail where indicated..

By: /s/ Richard A. Saldinger

Richard A. Saldinger Landsman Saldinger Carroll, PLLC Attorneys for Creditor – Dr. Stephen Lippitz 161 N. Clark Street, Suite 1600 Chicago, IL 60601 Tel. (312) 291-4650 saldinger@lsclegal.com

Registrants in the Case

David Freydin <u>david.freydin@freydinlaw.com</u>

Norm Newman nnewman@raineslaw.com

Patrick S. Layng <u>USTPRegion11.ES.ECF@usdoj.gov</u>

Samantha San Jose <u>ssanjose@raslg.com</u>

Mark Melickian <u>mmelickian@raineslaw.com</u>

Ed Rothschild <u>edwardrothschild66@gmail.com</u>

David Madden dmadden@raineslaw.com

Boris Parad pl2@paradfirm.com

Maria Sanchez <u>mariasanchez@hsbattys.com</u>

Service by United States Mail

Russland Capital Group – South Loop, LLC c/o George Lattas – Registered Agent 3660 W. Irving Park Road Chicago, Illinois 60618

Russland Capital Group – South Loop, LLC c/o Felix Friedman 1407 S. Michigan Suite 500 Chicago, Illinois 60605

Felix Friedman 1400 S. Michigan Avenue Unit 2410 Chicago, Illinois 60605

Irina Bletnitsky 1400 South Michigan Avenue Suite 2801 Chicago, Illinois 60605

Irina Knaster 21 East 1st Street New York, New York 10003

Alex Knaster 21 East 1st Street New York, New York 10003

Alex Knaster c/o Pamplona Capital Management 200 Clarendon Street Floor 48 Boston, Massachusetts 02116